NEW UNDERGROUND HYDROCARBON STORAGE WELL/CAVERN FINAL PERMIT APPLICATION

In conformity with the provision of K.S.A. 55-1,117 through K.S.A. 55-1,119, and K.A.R. 28-45-2a through K.A.R. 28-45-30, the undersigned, representing

(Name of company, corporation or person applying)

hereby makes application to the Kansas Department of Health and Environment for a permit to create and operate underground hydrocarbon storage wells described below in Part II. This application shall be signed by an executive officer of a level of at least Vice-President. A signature statement is attached.

Part I for a new well at a new facility should be completed and submitted with Part II.

Part I for a new well at an existing facility should be updated and referenced by Part II.

Part II should be completed for each cavern.

PART I – FACILITY

A. Mans

Information for maps A1 through A4 may be submitted on separate maps or on one map. The maps should be drawn to scale.

- 1. Provide a map that shows that the boundaries of the facility are located at least:
 - three miles from the boundaries of municipal population centers
 - five miles from an active or abandoned conventional shaft mining operation
 - two miles from any solution mining operation
 - one mile from an existing underground porosity storage facility
- 2. Provide a map of the following features or structures located within one mile of the storage facility's perimeter:
 - existing and proposed underground hydrocarbon storage wells, water supply wells, oil field wells, gas wells, brine production wells, disposal wells, monitoring wells, abandoned wells, dry holes, and core holes
 - surface water bodies, brine retention ponds, and springs
 - existing and proposed pipelines, mines, quarries
 - a faults and other pertinent surface structures

- 3. Provide a map showing all utilities having right-of-way, including pipeline, railway, roadway, and electrical lines. In addition, assess the potential effects of the identified utilities on the location or operation of the storage facility.
- 4. Provide a map indicating the boundaries and ownership of tracts of land adjacent to the facility.
 - Include with the map a list containing the names and mailing addresses of property owners adjacent to the facility boundaries that are keyed to the map.
 - Demonstrate that the distance of the proposed cavern's outer boundary will be greater than 100 feet from:
 - o the property boundary of owners who have not consented to underground storage beneath their property
 - o any existing surface structure not owned by the applicant
 - o any transportation artery

B. Well Information

Provide a tabulation of data on all wells penetrating the salt section within one mile of the storage facility. These wells should be keyed to the map A2.

- □ the type of well
- □ well's current status
- construction details, if known
- construction date, if known
- □ location
- □ total depth, if known
- any plugging or completion data

C. Geology/Hydrogeology

Provide a report prepared by a licensed geologist that includes:

- an evaluation of the geology and hydrogeology supported with:
 - o isopach and structure maps of the salt formation
 - water-level or potentiometric maps
- a cross section showing:
 - o aquifers
 - o local stratigraphy
- a regional stratigraphic map
- a regional geological evaluation, prepared by a licensed geologist, describing any potential adverse impact on the storage cavern from:
 - o salt thinning due to any change in stratigraphy
 - o a dissolution zone in the bedded salt
- local and regional structural analyses, including maps, cross-sections and available geophysical data
- an assessment of the potential for ground subsidence
- a description of potential risks to the storage operation from activities conducted at adjacent facilities
- a core analysis for the facility

D. Operations and Maintenance Plan

Submit a long-term operations and maintenance plan for the facility. The plan should include the following:

- a facility location map showing boundaries, location of existing and proposed underground storage wells, existing and proposed pipelines for each cavern, brine retention ponds, surface structures, shallow and deep groundwater observation wells, water supply wells, and disposal wells (Map A2)
- a schematic of the gathering line system that connects all wells
- a schematic of brine and product lines for each cavern
- a description of methods to be used to prevent over-pressuring of wells and caverns
- design information and plans for holding tanks, separators, lines, pumps, filters, and other equipment used in the storage operation at the facility
- a quality assurance/quality control (QA/QC) plan outlining the steps to be taken (such as calibrating and certifying gauges) to assure readings are accurate and reliable for:
 - o continuous pressure monitoring equipment
 - o supervisory control and data acquisition (SCDA) system(s)
 - o system(s) used to measure the volume of hydrocarbons injected into or withdrawn from an underground storage well
- plans and diagrams for emergency control and spill containment structures used to prevent surface and subsurface contamination in emergency situations
- a description of the containment and remediation methods to be used if usable water or soils become contaminated.
- a list of the permit numbers for the brine ponds at the facility.
- a contingency plan for the disposal of excess brine.

E. Emergency Response Plan

Submit an emergency response plan:

- Describe the facility's proposed response to the following events:
 - o spills and releases
 - o fires or explosions
 - o cavern subsidence or collapse
 - o any other activity that endangers public health, safety, or constitutes a threat to the environment
- □ The plan should include:
 - o a description of the warning systems for the facility
 - o a description of emergency response procedures
 - o a description of the communication system for emergency response
 - o a description of employee training for emergency response
- Provide a description of the facility's protection against accidental damage from hazards such as vehicular traffic, railroads, electrical power lines, aircraft, or shipping traffic.
- Provide a description of security measures to prevent unauthorized entry and to secure the facility.

F. Groundwater Monitoring Plan

Submit a groundwater monitoring plan

- a description of the monitoring wells
 - o a map, to scale, showing the monitoring well locations
 - o a tabulation showing each well's total depth and screened interval
 - o the geologic formations at total depth and at the screened interval
- a quality assurance plan with a description of sampling and analysis techniques
- a monitoring plan for obtaining quarterly chloride samples, monthly combustible gas readings, and quarterly static water level measurements
- a plan for collecting, describing, and logging well cuttings from any new monitoring well or stratigraphic test hole as specified in KDHE's "Procedures for Sample Logging" (UICLPG-9)

G. Ground Subsidence Monitoring Plan

Submit a plan for monitoring ground subsidence at the storage wells. Identify the permanent benchmark and describe the criteria used to establish this point as a permanent benchmark

H. Proof of financial assurance

Provide proof of financial assurance for closure of the storage facility and the plugging of any underground hydrocarbon storage well.

I. Annual Report

Submit the annual report for the facility which is due on or before April 1 of each year.

PART II – UNDERGROUND HYDROCARBON STORAGE WELL/CAVERN

INFORMATION

I certify that all information in Part I of this application is true and
applicable as it pertains to Well .
Well identification

Table 1:

Table 1.								
Well Identification			Status					
Global positioning system coordinates								
US Public Land Survey System	US Public Land Survey System							
Section	Township	Range	Quarters					

Table 2:

Open-Hole Requirements: (specified or other approved)										
Gamma log	Neutron or sonic	Density		Caliper	Sample cuttings					
Туре	Туре	Type		Туре	Sampling interval: Wet sample set:					
Date	Date	Date		Date	Dry sample set:					
Groundwater samp	Groundwater samples from water bearing formations:									
Interval:	Date:		Lab:							

Table 3:

*Surface casing	Surface casing	Surface casing	Total depth	**Design	for maximum p	oressures			
material	size	weight			Burst	Tensile			
Intermediate casing material	Intermediate casing size	Intermediate casing weight	Total depth	**Design	for maximum p	oressures			
casing material	casing size	casing weight	casing	Collapse	Burst	Tensile			
Production casing material	Production casing size	Production casing weight	Total depth production	**Design	for maximum p	oressures			
casing material	casing size	casing weight	casing	Collapse	Burst	Tensile			
Tubing material	Tubing Size	Tubing weight	Total depth	epth **Design for maximum pressures					
O		0 0	tubing	Collapse	Burst	Tensile			
Description of tub	ing and packer a	assembly (if pres	sent, and include	design pressures	s)				
Description of wee	ep hole								
Has the integrity of Verification methor		n verified?			tification for the				
Casing evaluation l					er, blanket mate				
og date:	<u> </u>			form	nation fluids, dr				
Mechanical integrit	y test			any	test materials.				
ype:									
Test date: Cement bond log:									

^{*} Surface casing requirements in K.A.R. 28-45-14
**Performance standards for casing and tubing are specified in API Bulletin 5C2 (§16).

Table 4:

Cement Information												
Surface Casing		Interval	Interval:									
Type and grade:	e and grade: Cement additiv		ype and grade: Cement additi		Slurry weight:	Compressive strength:	Number of sacks cement:	Cemented interval:				
Pressure testing (M	lethod, date, etc	.):		Cement bond log (type and date):								
Intermediate casi	ng:	Interval	l :									
Type and grade:	Cement additi	ves:	Slurry weight:	Compressive strength:	Number sacks of cement:	Cemented interval:						
Pressure testing (m				Cement bond log (type and date):								
Production casing	;	Interval	l :									
Type and grade:	Cement additi	ves:	Slurry weight:	Compressive strength:	Number sacks of cement:	Cemented interval:						
Pressure testing (m	ethod, date, etc.):		Cement bond log (type and date):								
Casing inspection	base log on in	nermost c	asing string:									
Type inspection log	g:			Log date:								
Cement program:	Describe cementing technique (equipment)											

Table 5:

Cavern Development
Description of containment for drilling fluids and formation cuttings:
Description of solutioning or washing method (process, compatibility of fluids, blanket material, etc.):
Description of maritarian formation and the control of the control
Description of monitoring for washing process:

Table 6:

Cavern Completion:										
Completion date	: :			Sonar	Date:					
				Maximum	diameter	Cavern	height		Capacity	
Gamma-density										
Date:		Salt top:			Cavern top:		Salt roof thicknes		oof thickness:	
Integrity Tests										
Nitrogen-brine			Hydro	static brine			Other			
Date:	Pass/fail		Date:		Pass/fail		Date:		Pass/fail	
Inspection date:					Commiss	ioning d	late:		L	

Table 7:

Operations								
Type product stored	Date							
Maximum allowable operating pressure	Depth to casing seat ft Gradient 0.75 ft or 0.80 psi/ft Calculated fracture pressure							
Maximum operating pressure	Minimum operating pressure							

Table 8:

Wellhead Instrumentation										
Emergency Shutdown Valves (ESD)										
Brine line:	Product line:		Water line:							
Rating:	Rating:		Rating:							
Date Installed:	Date Installed		Date Installed							
	Does ESD fail to a closed position?									
Does it automatically close all inlet	Does it automatically close all inlet and outlets to the cavern?									
Is it capable of remote and local ope	eration?									
Manual isolation valves:	Rating:		Date installed:							
Warning Systems		Connected to Ala	rm (yes or no)							
Hydrocarbon flow indicators										
Combustible gas indicator										
Pressure transducers Brir	ie side									
Proc	luct side									

Well identification:

Indicate the scheduled completion date for the actions listed by placing an "X" in the appropriate box.

Table 9:

Year	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
MIT		·	L		l	l	l		l	l	L	l	I				
Cavern																	
Well																	
Gamma der	sity																
Every 3																	
years																	
Every 5																	
years	.4*																
Casing Eval	uation	1			1	1	1		1	1	1	1	1				
Every 10 years																	
Every 5																	
years																	
Sonar Surve	ey																
Every 10																	
years																	
Safety Devi	ces	1	T			ı	ı		ı	ı	ı	1	ı				
SCADA																	
ESD valves																	
Pressure transducers																	
Flow																	
indicators																	
Combustible																	
gas indicators																	
indicators																	
Corrosion																	
Control																	
Biennial																	
Elevation																	
Survey																	
Ten year																	
audit																	